

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2015 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

TEOFIL BRANK,

aka "Jarec Wentworth,"

aka "@JarecWentworth,"

Defendant.

CR No. 15-00131(A)-JFW

TRIAL INDICTMENT

[18 U.S.C. § 875(d): Transmitting Threatening Communications with Intent to Extort; 18 U.S.C. § 1951(a): Extortion and Attempted Extortion Affecting Interstate Commerce By Nonviolent Threat; 18 U.S.C. § 880: Receiving Proceeds of Extortion; 18 U.S.C. § 1952(a)(3): Use of an Interstate Facility to Facilitate an Unlawful Activity]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 875(d)]

On or about February 16, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendant TEOFIL BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth" ("BRANK"), with the intent to extort money and things of value from victim D.B., knowingly transmitted in interstate or foreign commerce telephone communications and electronic text communications that

1 contained a true threat to injure the reputation of victim D.B., that
2 is, defendant BRANK threatened to distribute sensitive information
3 about victim D.B. on social media, if victim D.B. refused to transfer
4 money, a motorcycle, and the title to victim D.B.'s automobile to
5 defendant BRANK.

COUNT TWO

[18 U.S.C. § 1951(a)]

On or about February 17, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendant TEOFIL BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth" ("BRANK"), knowingly and with the intent to obtain property, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by extortion, as those terms are defined in Title 18, United States Code, Section 1951, in that defendant BRANK knowingly obtained personal property consisting of at least \$500,000 from victim D.B., with victim D.B.'s consent, induced by the wrongful use of fear, by threatening to distribute sensitive information about victim D.B. on social media, if victim D.B. refused to transfer money, a motorcycle, and the title to victim D.B.'s automobile to defendant BRANK.

COUNT THREE

[18 U.S.C. § 880]

On or about February 16, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendant TEOFIL BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth," received, possessed, concealed, and disposed of a vehicle that was obtained from the transmission in interstate commerce of a communication that contained a threat to injure the reputation of victim D.B., in violation of Title 18, United States Code, Section 875(d), knowing the same to have been unlawfully obtained.

COUNT FOUR

[18 U.S.C. § 880]

On or about February 17, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendant TEOFIL BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth," received, possessed, concealed, and disposed of money that was obtained from the transmission in interstate commerce of a communication that contained a threat to injure the reputation of victim D.B., in violation of Title 18, United States Code, Section 875(d), knowing the same to have been unlawfully obtained.

COUNT FIVE

[18 U.S.C. § 1951(a)]

On or about March 3, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants TEOFIL BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth" ("BRANK"), knowingly and with the intent to obtain property, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951, in that defendant BRANK knowingly attempted to obtain personal property consisting of at least \$1,000,000 from victim D.B. with victim D.B.'s consent, induced by the wrongful use of fear, by threatening to distribute sensitive information about victim D.B. on social media, if victim D.B. refused to transfer money, a motorcycle, and the title to victim D.B.'s automobile to defendant BRANK.

COUNT SIX

[18 U.S.C. § 1952(a)(3)]

On or about March 3, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendant TEOFIL BRANK, also known as ("aka") "Jarec Wentworth," aka "@JarecWentworth," used a facility of interstate or foreign commerce, namely a cellular telephone, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, extortion offenses in violation of the laws of the State of California and of the United States, and thereafter attempted to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of, the extortion.